

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

MAR 22 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY KJS DEPUTY

Joseph Glen Strawn,

(Enter the full name of the plaintiff.)

CIV-21-0247-JD

v.

Case No. _____
(Court Clerk will insert case number)

(1) Stephens County,

(2) Kyle Keithley Duncan Police Department

(3) Joe Lard Duncan police Department

(4) Cortnie Siess asst D.A. Stephens County D.A.
(Enter the full name of each defendant. Attach additional sheets as necessary.)

(5) Ron Williams Stephens County indigent attorney

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.

2. You must provide a full name for each defendant and describe where that defendant resides or can be located.

3. You must send the original complaint and one copy to the Clerk of the District Court.

4. You must pay an initial fee of \$400 (including a \$350 filing fee and a \$50 administrative fee). The complaint will not be considered filed until the Clerk receives the \$400 fee or you are granted permission to proceed *in forma pauperis*.

5. If you cannot prepay the \$400 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

- If the court grants your request, the \$50 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, **regardless of how the court decides your case.**

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. *See* 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

COMPLAINT

I. Jurisdiction is asserted pursuant to:

X 42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

 Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

Racketeering-Influenced and Corrupt
Organization

II. State whether you are a:

☐ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☒ Pretrial detainee

☐ Immigration detainee

☐ Civilly committed detainee

☐ Other (please explain) Stephens County Jail Inmate

III. Previous Federal Civil Actions or Appeals

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

1. Prior Civil Action/Appeal No. 1

None

a. Parties to previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

b. Court and docket number: _____

c. Approximate date of filing: _____

d. Issues raised: _____

e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?): _____

f. Approximate date of disposition: _____

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff

Name and any aliases: Joseph Glen Strawn

Address: 101 South 11th Duncan, OK,

Inmate No.: _____

2. Defendant No. 1

Name and official position: Kyle Keithley

City of Duncan Police Officer

Place of employment and/or residence: Duncan Police Department

18 S. 7th, Duncan, OK 73533

How is this person sued? () official capacity, () individual capacity, (X) both

3. Defendant No. 2

Name and official position: Joe Lard

City of Duncan Police Officer

Place of employment and/or residence: Duncan Police Department

18 S. 17th, Duncan, OK 73533

How is this person sued? () official capacity, () individual capacity, (X) both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).

4. Defendant No. 3

Name and official position: Cortnie Siess
asst D.A. Stephens County D.A.

Place of employment: Stephens County Courthouse
101 South 11th, Duncan, OK, 73533

How is this person being sued? ☐ official capacity
☐ individual capacity ☒ both

5. Defendant No. 4

Name and official position: Ron Williams
Stephens county indigent attorney

Place of employment: Stephens County Courthouse
101 South 11th, Duncan, OK, 73533

How is this person being sued? ☐ official capacity
☐ individual capacity ☒ both

6. Defendant No 5

Name and official position: Stephens County

Place of employment: Stephen County Courthouse
101 South 11th, Duncan, OK, 73533

How is this person being sued? ☐ individual capacity ☒ official capacity ☐ both

6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.

- If a ruling in your favor "would necessarily imply the invalidity" of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

1. **Claim 1:**

(1) List the right that you believe was violated:

During my arrest I was subject to police brutality
and physically assaulted by the arresting officers.
I was hit kicked and beat to the point the officers
had to transport me to Duncan Regional hospital for
xrays and examination. I believe it was excessive force

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Kyle Keithley

Joe Lard

Stephens County

(3) List the supporting facts:

The Police Officers assaulted me so bad my face was all
bruised and swollen and cut up and I had bruises all over my
body it was so bad they had to transport me to Duncan Regional
Hospital afterwards for physical examinations and xrays, And I suffered
migranes for weeks afterwards

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

relief for pain and suffering and disciplinary actions
for the Officers responsible for my injuries and assaulting
me. Relief and monetary for my pain and suffering
and physical injuries requesting \$100,000

2. Claim II:

(1) List the right that you believe was violated:

False Charge assault on a police Officer against me
Malicious prosecution of a false assault charge

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Cortnie Siess asst DA

Ron Williams indigent attorney

Stephens County Courts

Joe Lard D.P.D.

Kyle Kiethley D.P.D.

Side note

I am a victim of Stephens Counties corruption a County that is well known for there corruption. Cortnie Siess is the D.A. her mom Sharon Cain is head of drug court her dad Randy Cain is a bailbondsmen her sister Jacobi Harper is also a bailbondsmen her relative Melody Harper is the Court Clerk it is a racketeer operation. They do not care about wether we are guilty or not and they will convict us of any bogus charge they can. This is not Justice can yall please step in and take a look at what is going on here. They dont respect or care about our civil rights all they care about is making money off our pain and suffering. The indigent attorney they use is Ron Williams and he lies to us and misrepresents us and tricks us into signing on what the D.A. wants to do to us. They take advantage of what we do not know about the law. Ron Williams told me when I first got here that all a prelim is is a chance for them to pick up more charges on people and if I waive it they can not pick up more charges so I waived it and now they picked up an assault on Officer charge that wasn't there before and I never even assaulted an Officer. This is just one example of the stuff they do I have many more but I am trying to be brief. Please look into what they are doing here we have nowhere else to turn to.

And if it all possible can I please have my charges I'm facing now moved to any other court then Stephens County Court.

(3) List the supporting facts:

I am being falsely accused of a crime I didn't
commit I never assaulted an Officer and didn't even
defend myself while they assaulted me and I noticed
they were wearing body cams so there should be evidence
of what really happened

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

Seeking relief from the false charge for it to
be dismissed and disciplinary actions for those involved
in this malicious prosecution

If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s).

VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.

Joseph Strawn
Plaintiff's signature

03/17/21
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 17 day of March, 2021.

Joseph Strawn
Plaintiff's signature

03/17/21
Date